

**REMARKS**

The Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated January 22, 2008 has been received and its contents carefully reviewed. Applicants appreciate the indication of allowable subject matter by the Examiner.

Claims 1-5, 14-18 and 23 are rejected by the Examiner. With this response, claims 1 and 23 are amended. No new matter has been added. Claims 1-5, 14-18, and 21-23 are pending in the subject application, with claims 21 and 22 having been previously withdrawn.

In the Office Action, claims 1-5, 14 and 15 are rejected under 35 U.S.C. §103(a) as being unpatentable over Japanese Publication 2000-284295 to Satoshi et al. (hereinafter "Satoshi") in view of U.S. Patent No. to 2,874,751 Norton (hereinafter "Norton"). Claims 16-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Satoshi and Norton, further in view of U.S. Patent No. 5,324,053 to Kubota et al. (hereinafter "Kubota"). Claim 23 is rejected as being unpatentable over Satoshi and Norton, further in view Japanese Publication JP11-264991A to Matsushita (hereinafter "Matsushita"). Claims 1-5, 14-18, and 23 are rejected under 35 U.S.C. §112, second paragraph.

The rejection of claims 1-5, 14 and 15 under 35 U.S.C. §103(a) as being unpatentable over Satoshi in view of Norton is respectfully traversed and reconsideration is requested. Applicants submit that the cited references including Satoshi and Norton do not teach or suggest the combined features of the claims.

Independent claim 1 recites a substrate bonding apparatus for manufacturing a liquid crystal display (LCD) device, having a combination of features including, for example, "wherein the at least one of the first and second elastic members arranged between the fixing plate and the securing plate include a first restorative elastic member and a second restorative member, the first restorative elastic member nearer a center region of the fixing plate than the second first restorative elastic member, and the first restorative elastic member having a restorative force constant greater than a restorative force constant of the second restorative elastic member whereby the first restorative elastic member and the second restorative elastic member apply restorative forces to the fixing plate and securing plate to oppose deformation of

the securing plate due to deforming forces generated by convex bending of the corresponding one of the upper and lower chamber units due to application of the vacuum pressure and the weight of the upper and lower stages.”

In rejecting the claims, the Examiner acknowledges that Satoshi does not disclose the elastic members, and relies on Norton’s disclosure of “springs (20) between the platen and the face piece” to cure the deficiencies in the teachings of Satoshi. See Office Action page 4.

Applicants respectfully disagree with the conclusion that the teachings of Norton cure the deficiency in Satoshi. Applicants submit that Norton does not teach or suggest at least “the first restorative elastic member nearer a center region of the fixing plate than the second first restorative elastic member, and the first restorative elastic member having a restorative force constant greater than a restorative force constant of the second restorative elastic member” as recited by claim 1. Accordingly, Applicants submit that Satoshi and Norton, analyzed singly or in any combination, do not teach or suggest the combined features of claim 1, or of claims 2-5, 14, and 15 depending from claim 1.

The rejection of claims 16-18 under 35 U.S.C. §103(a) as being unpatentable over Satoshi in view of Norton, and further in view of Kubota is respectfully traversed and reconsideration is requested. Applicants submit that the cited references including Satoshi, Norton, and Kubota do not teach or suggest the combined features of the claims.

Claims 16-18 depend from claim 1, and each includes by reference all of the features of claim 1. As discussed above, Satoshi and Norton do not teach the combined features of claim 1. In rejecting claims 16-18, the Examiner relies on Kubota to teach “wherein the securing plate includes stainless steel,” “wherein the securing plate includes an aluminum alloy” and “wherein the securing plate is at least about 40mm thick” as recited in claim 16-18. Applicants do not reach the Examiner’s conclusion regarding Kubota. Applicants submit that Kubota does not cure the deficiencies in the teachings of Satoshi and Norton with regard to the combined features of claim 1, and that Satoshi, Norton, and Kubota, analyzed singly or in any combination do not teach the combined feature of the claims. Accordingly, Applicants submit that claim 1, and claims 16-18 depending from claim 1 are each allowable over Satoshi, Norton, and Kubota.

The rejection of claim 23 under 35 U.S.C. §103(a) as being unpatentable over Satoshi and Norton, further in view Matsushita is respectfully traversed and reconsideration is requested. Claim 23 has been amended to recite the subject matter identified by the Examiner as allowable. Accordingly, Applicants submit that claim 23 is allowable over the cited prior art including Satoshi and Norton, and Matsushita.

With respect to the rejection of claims 1-5, 14-18, and 23 under 35 U.S.C. §112, second paragraph, Applicants submit that with the amendments to claims 1 and 23, claims 1-5, 14-18, and 23 fully comply with 35 U.S.C. §112, second paragraph, and respectfully request that the rejection be withdrawn.

Applicants believe the application is in condition for allowance in light of the foregoing amendments and remarks and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. *A duplicate copy of this sheet is enclosed.*

Dated: April 2, 2008

Respectfully submitted,

By Valerie P. Hayes  
Valerie P. Hayes  
Registration No.: 53,005  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorneys for Applicants

The rejection of claim 23 under 35 U.S.C. §103(a) as being unpatentable over Satoshi and Norton, further in view Matsushita is respectfully traversed and reconsideration is requested. Claim 23 has been amended to recite the subject matter identified by the Examiner as allowable. Accordingly, Applicants submit that claim 23 is allowable over the cited prior art including Satoshi and Norton, and Matsushita.

With respect to the rejection of claims 1-5, 14-18, and 23 under 35 U.S.C. §112, second paragraph, Applicants submit that with the amendments to claims 1 and 23, claims 1-5, 14-18, and 23 fully comply with 35 U.S.C. §112, second paragraph, and respectfully request that the rejection be withdrawn.

Applicants believe the application is in condition for allowance in light of the foregoing amendments and remarks and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. *A duplicate copy of this sheet is enclosed.*

Dated: April 2, 2008

Respectfully submitted,

By Valerie P. Hayes  
Valerie P. Hayes  
Registration No.: 53,005  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 496-7500  
Attorneys for Applicants